

Ohio Republican Party  
C00162339  
(9/1/08 through 9/30/08) October Monthly

This correspondence is in response to your audit letter March 4, 2009, concerning the above referenced party requiring a response date by April 3, 2009. Your report pertains to an Amended October Monthly Report for the period September 1, 2008 through September 30, 2008. This correspondence, along with the associated amendments referred to herein, should constitute a complete response to your issues. In the event you need further clarification, please do not hesitate to contact us.

1. You asked for clarification of the nature of the transfer (in) from the Republican National Committee reported on Schedule A supporting Line 12. Additionally, you are requesting clarification for subsequent payments reported on Schedule B supporting Line 30(b) described as "non-allocable door hangers." As you suggested, we have sought further guidance by reference to 11 CFR Sec. 100.87 and Sec. 100.147 and the Campaign Guide for Party Committees.

The two events you have identified are completely unrelated. The transfer from the Republican National Committee reported on Schedule A Line 12 is simply funds received and not designated towards a particular expenditure. The expense reported on Schedule B Line 30(b) for "non-allocable door hangers" was actually paid from Home Grown Funds. As such, we believe the activity does meet the definition of "exempt" activity as the expenditures were not made on behalf of any specifically identified candidates that require disclosure. Therefore, we do not believe any correction or amendment to the report is necessary as a result of this inquiry.

2. You indicate that expenditures and disbursements for public communications that refer to a clearly identified candidate for federal office and that promote, support, attack or oppose and candidate for federal office meet the definition of Federal Election Activity under 11 CFR Sec. 100.24 and require disclosure on Schedule B Line 30(b) along with the identity of the candidate. The expenditures in question do not meet the definition of Federal Election Activity or contain express advocacy for a particular candidate such that they would require amendment of the report. The expenses were for generic political activities and did not list any specific activity or candidate.

3. You requested an amendment to Schedule B to clarify the description originally reported as "victory consulting through September 30, 2008" and "victory program consulting." You referred us to 11 CFR Sec. 104.3(b)(3). In review of the applicable Code section, we do not feel that the expense incurred with JPL & Associates for coalition consulting is adequately described by the referenced descriptions in this particular section namely, "dinner expenses, media, salary, polling, travel, party fees, phone banks, travel expenses, travel expense reimbursement or catering costs." Therefore, we believe that the description as originally provided is the only way to elaborate the activity which was performed, which is consulting, and, therefore, no amendment is necessary.

4. You requested additional information regarding a payment made reported on Schedule B for "Cisco firewall replacement." You asked for the name of the original vendor assuming that the amount reported was a reimbursement from a purchase made by an individual. We do not believe any amendment is necessary to our report relative to this issue as the payment was made directly to our ITT Director for supplies and equipment he owned personally and sold to the Ohio Republican Party. This was not resale transaction.

5. You requested our report be amended to report correct aggregate year-to-date totals for several individuals you believe to be incorrect. Please be advised that our report has been corrected to reflect the appropriate year-to-date totals. The error occurred due to the fact that memo entries do not aggregate on the report and as a result the year-to-date totals were inadvertently incorrect.

I assume this completes all matters relative to the report period in question. However, should you have any follow up

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## ETEXT ATTACHMENT

questions, please do not hesitate to contact us.

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